

### REMARKS

Before this Reply Claims 1-8 were pending in the patent application. Through this Reply, Claims 9-20 are added, such that Claims 1-20 are now at issue. Claims 1-4, 6 and 8 were rejected under 35 USC 103(a) as being unpatentable over USPN 5,956,487 to Venkatraman et al. (hereinafter "Venkatraman") in view of USPN 6,148,346 to Hanson. Claims 5 and 7 were rejected under 35 USC 103(a) as being unpatentable over Venkatraman and Hanson as applied to Claim 1 above, and further in view of USPN 5,938,726 to Reber et al. (hereinafter "Reber").

Claim 1 has been amended to further clarify generation of a device list file in an autonomous and dynamic manner. Claim 6 has been amended to provide proper antecedent basis. New claims 9-20 have been added. No new matter has been added. Entry of the amendments and the new claims is respectfully request.

### Claim Rejections under 35 USC §103(a)

Rejection of Claims 1-4, 6 and 8 under §103(a) as being unpatentable over Venkatraman" in view of Hanson is respectfully traversed because the claims include limitations not taught or suggested by the cited references alone, or in combination.

Venkatraman is directed to a system wherein Web access functionality is embedded in a device to enable accessible user interface functions for the device. A web server in the device provides access to the user interface functions for that device through a device web page. A network interface in the device enables access to the web page by a web browser such that a user

of the web browser accesses the user interface functions for the device through the web page.

(Abstract).

The Office Action contends that Venkatraman and Hanson teach generating a device list file in an autonomous manner, wherein the device list file identifies home devices that are currently connected to the home network, as required by Claim 1. It is respectfully submitted that such limitations are not taught or suggested by the references alone or in combination. Further, through this Reply, Claim 1 has been amended to further clarify that, the device list file is generated in an *autonomous and dynamic* manner, wherein the device list file identifies home devices that are currently connected to the home network. Such limitations are not taught or suggested by the references alone or in combination.

Venkatraman does not provide a means that may autonomously and dynamically identify/locate and access the devices currently connected to the network. On Pages 3 and 7, the Office Action contends that Venkatraman teaches generating a web page dynamically to reflect the updated state of the information pertaining to a device maintained by a monitor (col. 3, lines 33-36), suggesting autonomous generation since it is dynamically updated without user help, providing the benefit of automatic updating to reflect changing device parameters.

In col. 3, lines 33-36, cited by the Office Action, Venkatraman states:

In response to an HTTP command targeted for the device 10, the web server 14 generates a web page 18 that defines a set of user interface functions for the

device 10. The web page 18 is a Hypertext Markup Language (HTML) file. The network interface 12 transfers the web page 18 to a requesting HTTP client via the communication path 22.

Applicant respectfully submits that the Patent Office's contention is out of context, and further respectfully requests that the Patent Office explain how this passage has anything to do with the claimed invention. There is no teaching or suggestion in the references, alone or in combination, of the claimed autonomous and dynamic generation of a device list file. As shown in Fig. 1a, Venkatraman is directed to a system wherein Web access functionality is embedded in the device 10 to enable accessible user interface functions for the device 10. A web server 14 in the device 10 provides access to the user interface functions for that device 10 through a device web page 18. A network interface in the device enables access to the web page by a web browser such that *a user* of the web browser accesses the user interface functions for the device 10 through the web page 18. Further, the monitor 16 controls device specific function of the device 10 only, not any other device connected to the network. (Venkatraman, Abstract and col. 3, lines 5-36).

On page 7, the Office Action further contends that Venkatraman teaches dynamically updated Web pages for devices. But that is not the case. The home page of a printer device 10 shown in Fig. 3 of Venkatraman is provided only response to user request, not dynamically nor autonomously as claimed herein.

Indeed, despite the Patent Office's contention, Venkatraman teaches away from Applicants' claimed invention by requiring that:

A user of one of the computer systems 90-92 enters a URL corresponding to the desired one of the devices 10 and 50-52 into the corresponding web browser application. In response, the particular web browser application as an HTTP client transfers an HTTP command that specifies the desired URL over the large organization network 80. The device specified by the HTTP command recognizes the URL contained therein. In response, the targeted device transfers an HTML file that defines its device web page via large organization network 80 (Col. 7, lines 36-46).

Venkatraman does not teach an autonomous and dynamic process as claimed herein. A user must enter the device URLs, and receiving a URL from a home device is not even taught or suggested by Venkatraman. There is no need for features of the claimed invention in Venkatraman because Venkatraman simply for embedding Web access functionality in a device to enable accessible user interface functions for the device.

In rejecting the claims, the Patent Office's arguments in the Office Action are based on the contention that Venkatraman teaches dynamic device list file generation. It is respectfully submitted that this is a misinterpretation of Venkatraman for the reasons above, which are not repeated again in detail below. Further, as the Office Action correctly states, Venkatraman does not teach a device list file associated with connected home devices, as in Claim 1 of the present

invention. The Office Action states that Hanson, Figure 5, column 5, lines 36-40, teach generating such a device list file.

Hanson is directed to a data communication system for allowing communication between various devices and various operating systems across various types of networking systems. The data communication system includes an host computer system 10 with a display device 15 and a processor 17 for generating signals for the display device, at least one peripheral device 56, and a dynamic device driver 42 for allowing two-way communication between the peripheral device and the host computer system. The dynamic device driver includes an operating system specific portion 33, configured for the operating system of the host computer system, and an operating system independent device driver portion 34, configured for the peripheral device. The operating system includes a linking mechanism 19 for allowing two-way communication between the operating system specific portion and the operating system independent device driver portion, thus allowing two-way communication between the processor and the peripheral device. (Abstract).

It is respectfully submitted that Hanson does not teach generating a device list file as claimed, because in Figure 5, Hanson shows a GUI object list of available printers, not a device list file that identifies home devices currently connected to the network. The claimed device list file here is different than the list in Figure 5 of Hanson. This is because, in one embodiment, the device list file includes logical device names, wherein each logical device name is obtained by *autonomously and dynamically* detecting that a device is connected to the network, and

associating a logical device name with that device. By contrast, the GUI list in Figure 5 of Hanson, is a list of features for printers, provided to help the user select which printer to use. The list of features include printer emulation, resolution, print speed, paper and envelope sizes, comments or additional printer features (col. 5, lines 36-40).

Furthermore, Hanson also fails to teach or suggest generating said device list file in an autonomous and dynamic manner that involves determining the location and availability of the devices connected to the network in an autonomous manner. Indeed Hanson requires specific entry of the location thereof. In one example, as specified in col. 6, lines 15-20 of Hanson, administrative maintenance menu 74 includes a "set printer name or password" button 75 that provides for installation of a new printer on the network in an install new printer menu 75a, see FIG. 8B. In the install new printer menu 75a, a user assigns a printer by entering the address that identifies the printer. Yet, in another example, specified in col. 7, lines 30-32, Hanson requires specific entry of the location thereof by the administrator, wherein the network administrator is prompted to insert URL codes that access the help files that are in HTML format.

The Office Action states that Venkatraman, Figures 2, 3, column 5 lines 29-40, 46-51, teaches creating a device link page including graphical or textual representations of corresponding devices. This interpretation of Venkatraman is respectfully traversed. As discussed, neither Hanson nor Venkatraman, alone or in combination, teach or suggest a device list file as Claimed by the present invention. Further, Venkatraman's Figures 2, 3, column 5 lines 29-40, 46-51, mention a browser 40 that accesses a user interface function of a device 10 at

a URL provided by a user, displays such user interface information. There is no mention, whatsoever, of a device list file or a device link page as claimed, or the limitation of: “creating a device link page, wherein the device link page contains at least one graphical or textual representation of corresponding devices that are identified in the device list file” (Claim 1).

The Office Action states that, Venkatraman, Figures 3, column 5 lines 36-42, teaches the claimed limitation of associating a hyper-text link with each device representation. This interpretation of Venkatraman, is respectfully traversed. Venkatraman that a web server 14 in a device 10 generates a web page 18 that defines a set of user interface functions for the device 10. The web server 14 generates the web page 18 dynamically to reflect the updated state of the information pertaining to the device 10 that is maintained by a monitor 16. The web page 18 may also define control buttons according to the HTTP protocol that enable various control functions for the device 10 to be initiated from a web client via a communication path (Col. 3, lines 16-18, 27-29, 33-40).

Further, a browser 40 that accesses a user interface function of a device 10 at a URL provided by a user, displays such web page (Figures 3, column 5 lines 29-42). Venkatraman’s teaching of the web browser 40 accessing and displaying the web page 18 created by the web server 14 in a device 10, does not teach or suggest the claimed limitation of “associating a hyper-text link with each device representation” or the limitation of “the hyper-text link provides a link to a web page that is contained in the device that is associated with the device representation”

(Claim 1). Applicant respectfully requests that the Patent Office specifically point out where such limitations are taught or suggested in the references.

Further, each reference itself must suggest a modification or combination proposed in order for the modification or combination to be valid; “[the] invention cannot be found obvious unless there was some explicit teaching or suggestion in the art to motivate one of ordinary skill to combine elements so as to create the same invention.” *Winner International Royalty Corp. v. Wang*, No. 96-2107, 48 USPQ.2d 1139, 1140 (D.C.D.C. 1998) (emphasis added). “The prior art must provide one of ordinary skill in the art the motivation to make the proposed molecular modifications needed to arrive at the claimed compound.” *In re Jones*, 958 F.2d 347, 21 USPQ.2d 1941, 1944 (Fed. Cir. 1992) (emphasis added). There is no suggestion from either reference that they be combined or modified as proposed by the Office Action and, in fact, even the Office Action fails to provide the necessary impetus for the modification. In addition, as illustrated through more detailed examples below, the references teach away from Applicant’s claimed invention and do not provide any suggestion for their combination or modification.

Therefore, Applicants respectfully request withdrawal of the rejection of Claim 1, and dependent claims therefrom, because the combination and modification of the references is improper and does not disclose all the limitations of Applicants’ claimed invention.

As to Claim 2, Applicants respectfully assert that since Claim 2 incorporates the novel and unobvious limitations of Claim 1, it is therefore allowable for its dependency due to the



reasons set forth above in relation to the rejection of Claim 1, as well as for its own novel sub-features. Despite the Office Actions' assertion, as discussed in more detail above, Venkatraman does not teach or suggest a link page as claimed. As the Office Action also states, Venkatraman does not teach associating/retrieving a logical name stored in a device list file, as well as icons. Despite the Patent Office's statement, neither Venkatraman nor Hanson, alone or in combination, teach or suggest that a device list file includes logical device names, wherein each logical device name is obtained by autonomously detecting that a device is connected to the network, and associating a logical device name with that device. By contrast, as discussed above, the GUI list in FIG. 5 of Hanson relied upon by the Patent Office, is nothing more than a list of features for printers, provided to help the user select which printer to use. The list of features include printer emulation, resolution, print speed, paper and envelope sizes, comments or additional printer features (column 5, lines 36-40).

Further, as set forth in greater detail above, the reference itself must suggest the modification or combination proposed in order for the modification or combination to be valid. There is no suggestion or motivation from either reference that they be combined or modified as proposed by the Office Action and, in fact, even the Office Action fails to provide the necessary impetus for the modification. In addition, as illustrated through more detailed examples below, the references teach away from Applicant's claimed invention and do not provide any suggestion for their combination or modification.

Therefore, Applicants respectfully request withdrawal of the rejection of Claim 2 because

the combination and modification of the references is improper and does not disclose all the limitations of Applicants' claimed invention and because the rejection thereof does not comply with the requirements set forth in the MPEP.

As to Claims 3-4, the Patent Office has again repeated the same reasoning for rejection of Claim 2. Rejection of Claims 3-4 are respectfully traversed for at least the reasons hereinabove in support of Claim 2. As such, rejection of claims 3-4 should be withdrawn.

The Office Action rejected Claim 6 under §103(a) as being unpatentable over Venkatraman. Applicants incorporate herein the remarks above set forth as to the novelty and unobviousness of Claim 1. In addition, the Office Action acknowledges that Venkatraman fails to teach all of the limitations of Applicants' invention and the rejection of Claim 6 under section 103 is therefore improper. For a modification or combination of the prior art to be proper, the prior art itself must provide a suggestion thereof. Venkatraman fails to suggest any combination or modification thereof and in fact the Office Action fails to modify the same or provide a suggestion or motivation thereof.

Further, Venkatraman does not show all of the limitations of Applicants' claimed invention. In fact, Venkatraman teaches away from Applicants' claimed invention by requiring that "A user of one of the computer systems 90-92 enters a URL corresponding to the desired one of the devices 10 and 50-52 into the corresponding web browser application." (Venkatraman, Column 7, lines 36-38). Conversely, Applicants' claimed invention provides a

session manager that determines the location and availability of the devices connected to the network in a dynamic fashion. Accordingly, even if the combination were legally justified, it would not teach all the limitations of Applicants' claimed invention because the method of receiving a URL from a home device is admittedly not taught by Venkatraman. A previous Office Action admits that Applicants' method of providing of a URL associated with the device provides increased information selectivity. However, the Office Action then attempts to improperly modify Venkatraman to achieve the advantages of Applicants' claimed invention. Applicants respectfully submit that the fact the modification produces admitted advantages militates in favor of the patentability of Applicants' claimed invention because it proves that the combination produces new and unexpected results and hence is unobvious. Therefore, Applicants respectfully request withdrawal of the rejection of Claim 6 because the modification of the reference is improper.

The rejection of Claims 5 and 7 under §103(a) as being unpatentable over Venkatraman and Hanson as applied to Claim 1, and further in view of Reber, is respectfully traversed. Applicants also respectfully traverse the rejection and the modification and combination of Venkatraman, Hanson and Reber. Applicants incorporate herein the remarks set forth above in response to the rejection of Claim 1 that clearly illustrates the novel and unobvious aspects of the claim over the references cited. As a result of the dependence of Claims 5 and 7 from Claim 1, Applicants respectfully assert that Claims 5 and 7 are in turn allowable.

Further, it is well settled that for a modification or combination of the prior art to be proper, the prior art itself must provide a suggestion for the asserted modification. Applicants respectfully traverse the proposed combination and modification. Reber teaches advertising on a first web page by displaying a logo of a sponsor that is linked to the web page of the sponsor. Accordingly, because the user is already on the first web page, there would be no reason or motivation for Reber to provide a logo of the first web page that links to itself. In addition, because Venkatraman already accesses the web page of the device to download information therefrom, there would be no reason to provide a logo to do so. Furthermore, because Hanson teaches providing a control mechanism for a printer accessed through a URL, there would be no reason to provide a logo for an alternate printer. Therefore, because of the diverse functioning of the references, there would be no motivation for the combination thereof to provide a LOGO as claimed by Applicants.

The Office Action seems to recognize the advantages of the presently claimed invention by trying to make “hind-sight” modifications to the references to achieve the claimed invention. The Office Action acknowledges that Applicants’ LOGO provides increased device recognition and attempts to improperly combine divergent references to achieve the advantages of Applicants’ claimed invention. Applicants respectfully submit that the fact the modification produces advantages in increasing device recognition by using a LOGO militates in favor of the patentability of Applicants’ claimed invention because it proves that the combination produces new and unexpected results and hence is unobvious.

Therefore, Applicants respectfully request withdrawal of the rejection of Claims 5 and 7 because the combination and modification of the references is improper and does not disclose all of the claimed limitations thereof.

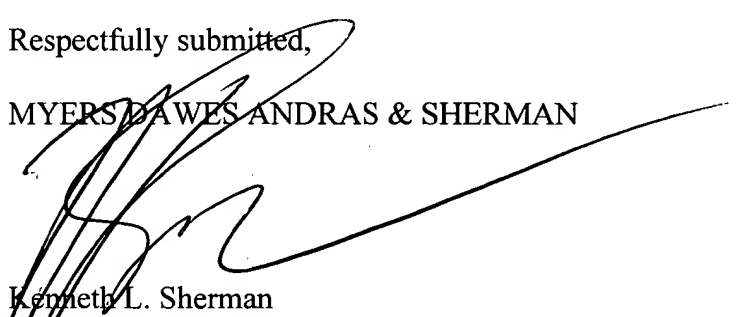
Further, it is respectfully submitted that new claims 9-20 are patentably distinct from the references.

### CONCLUSION

It is respectfully submitted that the case is now in condition for allowance, and an early notification of the same is requested. If it is believed that a telephone interview will help further the prosecution of this case, Applicants respectfully request that the undersigned attorney be contacted at the listed telephone number.

Respectfully submitted,

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